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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

CC 92-237

Report and Recommendations
of the
CIC Ad Hoc Working Group
to the
North American Numbering Council (NANC)
Regarding Use and Assignment
of
Carrier Identification Codes
(CICs)

February 18, 1998

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Table of Contents

	Page
Introduction and Summary	3
Discussion and Recommendations	6
Conclusion	14
Appendix A: List of Participants	15
Appendix B: Minority Opinions	16

Paragraph notations in this report are in reference to the following document:
Further Notice of Proposed Rulemaking and Order (Further Notice) in Administration of
the North American Numbering Plan, Carrier Identification Codes, FCC 97-364,
CC Docket No. 92-237 (released Oct. 9, 1997).

INTRODUCTION AND SUMMARY

1. In its Further Notice of Proposed Rulemaking and Order (Further Notice) in *Administration of the North American Numbering Plan, Carrier Identification Codes*, FCC 97-364, CC Docket No. 92-237 (rel. Oct. 9, 1997), the Federal Communications Commission (Commission or FCC) directed the North American Numbering Council (NANC) to present to the Commission the NANC's recommendations on the tentative conclusions and proposals in the Further Notice relative to the use and assignment of Carrier Identification Codes (CICs). The Further Notice specifically charged the NANC with addressing, among other things:

how to define "entity" and whether the CIC conservation measures such as a limit on CIC assignments per entity, a limit on the total number of four-digit CICs available for assignment, and mandatory CIC reclamation procedures, are needed to meet the Commission's numbering policy goals.

Further Notice at ¶¶ 2, 63. The recommendations set forth in this Report are the NANC's response to the FCC's directive, and represent a consensus within the industry achieved through cooperative discussion and problem solving within the NANC CIC Ad Hoc Working Group. Participants in the Working Group represented a cross section of the industry, e.g. Incumbent Local Exchange Carriers, Competitive Local Exchange Carriers, Interexchange Carriers, and Industry Associations. See Appendix A for a list of the participants.

This Working Group reviewed and supported the numbering principles set forth in International Telecommunications Union Recommendation E.190 which state in part that conservation unto itself is not a valid reason to deny applications for numbering resources.

2. The NANC believes that the CIC conservation plan developed by the industry and adopted by the Commission in its April 1, 1997 *Second Report and Order* has well-served the objective of avoiding premature depletion of these numbering resources during the transition from three-digit to four-digit CICs.

The Further Notice, however, appears to be based on the premise that strict conservation measures remain necessary even after expansion of the total available Feature Group D (FG D) CICs from 1,000 to 10,000 codes. Hence, the Commission has proposed to expand the definition of "entity" by eliminating the "control" test and tentatively concludes that a six CIC limit per entity should apply when four-digit CICs outside the 5XXX and 6XXX pool are available at the end of the transition to four-digit codes. Further Notice ¶¶ 24, 35. The NANC has reviewed the Commission's tentative conclusion and concludes that it would not be appropriate to continue the present conservation plan of two CICs per entity after the transition has been completed. Furthermore, the NANC supports the limit

of six CICs per entity in the current industry guidelines pending evaluation after six months to determine whether the limit can be increased.

3. The NANC believes that while there could be an increase in assignment of CICs when the transition ends due to pent up demand stemming from the duration of conservation limits, it is unlikely that CICs will experience significant shortage once the resource is expanded to 10,000 codes. As a precautionary measure, the NANC recommends that the Commission maintain the per-entity limit of six CICs for the first six months following the end of the permissive dialing period. If, as the NANC expects, there is no evidence of an immediate shortage of CICs, the NANC will evaluate the six code allotment at the end of that six-month period and make recommendations.

4. With respect to the other issues on which the Commission has sought the NANC's views, the NANC recommends that:

- The Commission should not adopt the CIC Assignment Guidelines as formal rules, except for the existing requirements that CICs actually be activated and used by the assigned carrier.
- The current requirement for a CIC holder to purchase a Feature Group D (FG D) trunk should be eliminated in light of changes in access technologies and market requirements.
- Access uses of CICs should not be constrained, because the alternatives to CICs discussed in the Further Notice do not provide sufficient flexibility to carriers to meet their networking needs.
- The "Special Use" category of CICs should be eliminated.
- The definition of entity should be as follows: An entity is a firm or group of firms under common ownership and control. Control is defined as one firm having a 50% or greater ownership interest in another.

5. In addition, the NANC recommends that:

- Sharing of CICs among entities is a business matter that should be permitted but not required.
- Consistent with the current CIC Assignment Guidelines, CICs obtained through merger or acquisition should not count toward a carrier's CIC limit.

- Extraordinary conservation measures to extend the four-digit CIC resource "as long as possible" are unnecessary and inappropriate. Four-digit CICs are estimated by the NANC to have a useful life of 22 years, even assuming initial increased assignment after elimination of the current two-code per carrier assignment limitation. A five-digit CIC and associated Carrier Access Code (CAC) should be defined as the expansion plan on exhaust of four-digit CICs, with a conservation plan implemented, if necessary, when the four-digit CIC resource is estimated to be within five years of exhaust.
- The current Industry Numbering Committee (INC) reclamation procedures provide the North American Numbering Plan Administrator (NANPA) with a proven and workable means for reclaiming unused CICs and should be retained.
- The requirements that CICs be activated within six months of assignment and that CICs show usage and access, as indicated on semi-annual local exchange carrier (LEC) reports, should be codified as Commission rules.

6. The NANC believes that these recommendations are consistent with the balanced considerations under which the current CIC Assignment Guidelines were formulated. First, the recognition that CICs represent a finite resource and should, therefore, be used efficiently and conserved to the extent possible; and second, that their prudent use is inherent in the provision of telecommunications services. Therefore, the NANC believes that any Commission rules on CICs should maintain the basic tenet of the CIC Assignment Guidelines, which are designed so that CICs can be assigned to provide the greatest latitude in the provision of telecommunications services, while maintaining the effective management of a finite resource.

Based upon the findings of the Commission in this proceeding, the NANC will address the necessary changes to the CIC Assignment Guidelines through industry committees.

DISCUSSION and RECOMMENDATIONS

Codification of the CIC Assignment Guidelines (Paragraph 10 and 13)

7. The Further Notice tentatively concludes that "Commission rules would better serve our objectives of promoting competition and minimizing costs of CIC expansion than voluntary industry guidelines." Further Notice ¶ 10. The NANC respectfully disagrees, and suggests that there appear to be no reasons or benefits associated with a blanket codification of the CIC Assignment Guidelines. The NANC therefore recommends that the Guidelines not be adopted in their entirety as Commission Rules. It is recognized, however, that there may be some individual areas within the Guidelines (e.g., activation and usage) that might be beneficial if referenced as a Commission Rule. See the discussion below regarding Paragraphs 46-51 and 53 of the Further Notice.

8. Specifically, the NANC cannot concur with the FCC's view that mandatory Commission regulations are needed to protect competition and avoid exhaust of the CIC resource. The NANC believes that under most circumstances, FCC rules cannot be changed without public notice and a lengthy comment cycle, which would introduce unnecessary delay in the issue resolution process – a process that might otherwise be completed more quickly through industry consensus developed within the existing industry committee structure.

9. Further, although it might be argued that rules can be implemented with greater authority than industry guidelines, and may therefore mitigate disputes, the NANC dispute resolution process is available to resolve issues related to CIC assignment and use, should such disputes arise. In addition, to the extent that it is believed that rules may reduce the demand for CICs and therefore delay the need for further CIC expansion and defer the associated costs, it should be recognized that such costs are generally driven by legitimate telecommunications business needs and represent expenses that service providers are willing to incur.

10. Finally, NANC believes that blanket codification of the industry guidelines by the FCC could have adverse consequences for U. S. telecommunications entities. The use of Commission Rules might create inequities in the manner in which CICs are assigned and administered. Specifically, such rules would only apply to those entities subject to FCC jurisdiction (i.e., U.S. carriers) while carriers within Canada and the Caribbean would be assigned CICs pursuant to industry guidelines, and their respective government administrations. If possible, such potential distinctions should be avoided when service providers receive resources from a common source (i.e., the NANPA).

Prerequisite of an FG D Access Request for CIC Assignment (Paragraph 17)

11. The NANC supports the resolution of Industry Numbering Committee (INC) Issue 103, Translations Access for Feature Group D CICs, which eliminates the need for the purchase of a FG D trunk as a prerequisite for a FG D CIC assignment. The need for the purchase of a single access trunk appears to be an unnecessary administrative burden for resale providers who seek to route traffic originated by their customers to the network of a facilities-based carrier. Currently, a FG D CIC applicant must purchase at least one FG D access trunk from some access provider, somewhere in the nation. Upon receipt of its CIC assignment and completion of business arrangements with a facilities based provider, that applicant need not obtain any additional access trunks and may request of any access provider that traffic originated from lines pre-subscribed to its CIC be routed over the access facilities of the other service provider. This type of access, known as "translations access", requires an Access Service Request (ASR), albeit without the need for the provisioning of distinct access trunk groups.

12. Assignment of FG D CICs without the need for the purchase of a FG D trunk (i.e., "translations access") could help alleviate some difficulties associated with resale. Specifically, translations access will facilitate the assignment of CICs to resellers, and thereby allow easier identification of these type service providers, enhancing the ability to resolve conflicts, including disputes which involve slamming. Indeed, some states are considering requirements which would mandate that resellers obtain CICs. Consequently, with the advent of translations access as a newer and improved form of access technology, the requirement that a FG D trunk access request be a prerequisite to CIC assignment is unnecessary and should be eliminated.

13. Within the NANC, some participants suggest that removal of the trunk purchase requirement could stimulate the number of CIC applications. There is, however, no data to predict this impact. In fact, the use of translations access may not significantly increase the demand for CICs as the access ordering process associated with this type access does not significantly reduce the time or expense required. It is further recognized that the use of translations access requires a modification to current CIC reporting methods, which presently identify CIC usage based upon access obtained over trunks identified with a given CIC.

Use of CICs and alternatives to CICs (Paragraph 18)

14. The Commission requests comment on uses of CICs and whether carriers are using CICs for purposes other than FG D access. Further Notice ¶ 18. CICs are used primarily by access providers for access routing (including presubscription) and access charging purposes, and by end users for "dial around" to allow connectivity to carriers to which they are not presubscribed. Access customers may also use CICs to support service differentiation or customer segmentation, or for unique marketing purposes.

15. In the Further Notice, the Commission suggested the possible alternatives to the use of CICs and sought comment on these alternatives. First, the use of SS7 signaling capabilities is not likely to provide a substitute for CICs. In fact, the scenario described in the Further Notice (footnote 32) would still require a CIC, albeit stored in an external database rather than resident in a switch. Second, the NANC concurs with the Commission that CICs should not be used if the application does not require the transmission of the CIC across a network boundary. However, the use of "pseudo" CICs, perhaps for purposes of "billing and identification of services," as described in footnote 33 is unclear, particularly with regard to assignment and administration. The NANC notes that the industry has recognized the need for CICs for intranetwork applications and that the CIC Assignment Guidelines have set aside a block of 200 CICs, the 9000 to 9199 range, for this purpose.

16. Third, the NANC recognizes that the availability of ANI might serve as a substitute for the use of CICs in some circumstances. Specifically, ANI look-up tables could identify specific calling lines and provide those lines with appropriate feature/functionality. However, the NANC concludes that the use of ANI Information (II) digits for this purpose is not a feasible alternative to FG D CICs. Although ANI II digits might be used to identify lines associated with certain service types, and could, therefore, potentially be used in lieu of CICs for some limited applications, ANI II digits are not available in all end offices and their use does not provide the flexibility available with CICs. Also, ANI II digits identify the class of service of the originating line, not the identity of the access customer to which a specific call is destined.

17. In summary, the NANC believes that use of CICs should not be constrained to a limited set of applications, that intranetwork applications should use the intranetwork CICs, that alternatives to CICs should be used at the discretion of the access customer, and that the use of CICs should ultimately be limited only by the maximum of CICs allotted to each entity. In addition, NANC believes there is merit in a study to examine the differences between intranetwork and pseudo CICs and that such an examination should be performed by the appropriate industry committee(s).

"Special Use" CICs (Paragraph 20)

18. Paragraph 20 of the Further Notice inquires whether "Special Use" CICs "remain necessary." The category of Special Use CICs was defined to accommodate the potential situation where the need of an access customer, who would otherwise not require another CIC, could only be accommodated by the access provider with an additional CIC assignment which would not count toward that access customer's maximum allotment of CICs. Although reasonable in concept, there have been no requests for Special Use CICs. The NANC therefore recommends that the category of Special Use CICs is not necessary and should be eliminated.

Definition of "entity" and exceptions to the "ownership" test (Paragraph 24)

19. The Further Notice proposes to eliminate the control element from the definition of "entity" in the CIC Assignment Guidelines on the ground that the "subjective nature of the concept [of] 'control' has made it sometimes difficult to administer CICs." Further Notice ¶ 24. In its place, the Commission tentatively concludes that an entity should be defined as entities that hold "any" direct or indirect ownership interest in another entity. The Commission also proposes an exception to the ownership test in situations where "denial of a separate CIC to a company could weaken competition," as in the case of a wireless subsidiary of an RBOC. *Id.* ¶ 30.

20. The NANC believes that control should not be dropped from the definition of entity, but recognizes that, as a legal matter, "control" may sometimes be difficult to determine. The NANC does not agree that the best course is to expand the definition of entity such that any direct or indirect ownership interest, regardless of magnitude, automatically makes two separate companies into one "entity" for CIC assignment purposes. Furthermore, the NANC believes that the broad "competitive necessity" exception proposed in the Further Notice is highly ambiguous and would likely be implemented in an inconsistent, case-by-case manner, defeating the goal of predictability and stability in numbering assignment processes.

21. Accordingly, the NANC does not support the Commission's proposals for definition of entity or for a general exception to the definition. The NANC recommends a definition of entity that removes subjectivity in the test of control by substituting a strictly quantitative ownership test. The NANC recommends the following definition for "entity":

An entity is a firm or group of firms under common ownership and control.
Control is defined as one firm having a 50% or greater ownership interest
in another.

The NANC believes that "control" is an underlying element in the definition of entity, and suggests that ownership at a level of 50% or greater implies control.

22. The NANC suggests that there should be no general exceptions to the limit of CICs that may be directly assigned to a given entity. Specifically, the NANC believes that a limit of six codes per entity as proposed in this report (see discussion of Paragraph 35 of the Further Notice) should be sufficient to satisfy the CIC demand of most entities, including the need to assign CICs to subsidiaries. If any entity believes it is confronted with an extraordinary situation which demands the assignment of a CIC beyond the limit, the situation can be addressed by the Commission on an individual case basis.

CIC sharing arrangements (Paragraph 32)

23. The NANC suggests that CIC sharing between commonly owned entities, or even between separate entities, should not fall under FCC oversight. If business

interests are such that sharing a resource benefits both parties and saves an industry resource, sharing should be permitted at the discretion of the involved entities. The NANC believes that to the extent the sharing of CICs involves Customer Proprietary Network Information (CPNI), rules concerning CPNI would apply and, therefore, CPNI should not be compromised.

Allowable number of CICs per entity (Paragraph 35)

24. The NANC believes that, in the long term, entities should not be constrained to the direct assignment of six codes, but that the CIC allocation be expanded to better serve the needs of access customers and their subscribers. The availability of a pool of 10,000 codes should support a more liberal allocation of CICs. Notwithstanding its belief, the NANC recognizes that sufficient uncertainties related to CIC demand and assignment rates suggest that an increase in CIC allotment be achieved in an evolutionary manner. Accordingly, the NANC proposes that each entity be permitted to obtain up to six codes, the limit prescribed in the existing guidelines. At the time these guidelines were formulated, it was believed that the limit of six codes per entity presented a balance between conservation and need. In addition, the NANC recommends that any entity in need of more than six directly assigned CICs can petition the Commission to request such additional assignments.

25. The NANC believes that, while there could be an increase in assignment of CICs when the transition ends due to pent up demand stemming from the present conservation limits, it is unlikely that there will be a significant shortage of CICs. To verify this assumption, the NANC proposes that the demand and assignment rate be monitored monthly by the NANPA and reported to the NANC. If, as the NANC expects, there is no evidence of extraordinary demand or concern of a potential shortage of CICs after the first six months, the NANC will recommend an increase in the allowable limit of CICs per entity. In addition, the NANC suggests that a similar review be conducted after one year. Again, if the demand and assignment rate for codes under the expanded limit does not place an unreasonable burden on the CIC resource, further expansion of the limit should be considered.

26. If a high rate of assignment is ever experienced and the life of the four-digit CIC resource becomes questionable, conservation measures can be implemented at that time. In any event, upon the end of the permissive dialing period, the Commission should remove its two code per entity assignment limit and allow the industry guidelines to take effect.

CICs obtained through mergers or acquisitions (Paragraph 36)

27. The NANC recommends that CICs associated with mergers and acquisitions should transfer to the new entity with verification to the NANPA.

28. The NANC further recommends, consistent with the current CIC Assignment Guidelines, that CICs acquired through mergers and acquisitions should not count toward the maximum number of CICs which can be directly assigned to any given entity. It is suggested that upon completion of the acquisition or merger, the entity acquiring the codes should notify the NANPA, listing those CICs involved and stating their intent to continue to use those codes. Accordingly, codes acquired through these means need not be returned to the NANPA, assuming the codes remain active and in use.

29. The NANC considered the suggestion that there be a maximum number of CICs that any entity could hold, and that this limit might be derived from a percentage of the total CIC resource. For example, $.05\% \times 10,000 \text{ codes} = 50 \text{ codes per entity}$. Under this example, if any entity, through multiple acquisitions or mergers, obtained large numbers of CICs, it would be required to return all but 50 codes. The NANC concluded that no such limit should be imposed.

Implementation of a conservation plan (Paragraph 39)

30. The Further Notice tentatively concludes that a conservation plan is necessary when four-digit CICs outside the 5XXX and 6XXX pools become available, and seeks comment on whether "when a predetermined percentage of all four-digit Feature Group D CICs have been assigned, we should institute a conservation plan that would automatically be triggered." Further Notice ¶¶ 35, 39. The NANC finds that this approach unnecessarily restricts carrier flexibility without any significant risk of short-run depletion of the CIC resource. Thus, the NANC recommends that the Commission adopt a more flexible and longer-term perspective on CIC conservation in a four-digit CIC environment.

31. A conservation plan is only necessary if it is determined the CIC resource will exhaust in less than the time estimated by the industry to develop and deploy an expanded five-digit CIC plan. The industry estimates that a five year timeframe will be necessary to implement an expanded CIC format -- a five-digit CIC with a 10XXXXXX CAC. Years to exhaust is a more relevant trigger for the implementation of conservation than a specific assignment percentage. The method of conservation that might be implemented (e.g., a reduced limit on the number of CICs per entity, a more aggressive reclamation procedure, etc.) would be determined by the industry.

Expansion to a five digit CIC (Paragraph 40)

32. A five digit CIC and associated CAC of the form 10XXXXXX should be defined as the recommended expansion plan for four-digit CICs, if such expansion becomes necessary. Specific costs associated with this expansion and a specific transition plan necessary to allow an orderly migration to the five-digit format must be developed. However, it is premature and inappropriate to develop the detailed technical means and associated costs using present technology and assumptions, as it is not possible at present to predict the technology or estimate the cost of future network architectures. Therefore, the NANC recommends developing such technical analysis and cost estimates at the time when the four-digit CICs are within five years of exhaust.

The NANC recommends that extraordinary conservation plans to extend the current four-digit format for "as long as possible" (Further Notice ¶ 40) are unnecessary and inappropriate. Rather, CIC assignments should be made consistent with the guidelines, code assignment rates should be monitored, time to exhaust predicted, and implementation of the expanded five-digit format begun at a time appropriate to ensure continued availability of the CIC resource. The implementation timeline must accommodate the need for development and deployment, permissive dialing, and end user education. Business and competitive needs should take precedence over conservation.

Opening all four-digit CICs to assignment (Paragraph 42)

33. The NANC agrees that four-digit CIC assignments should not be limited to the 5000s and 6000s blocks after permissive dialing has ended. Further Notice ¶ 42. Indeed, as the Commission suggests, assignments from this relatively small pool of codes would likely mandate continued restrictions on the number of allowable codes per entity. Rather, with the end of the permissive period, CIC assignments should be made from as large a pool of codes as possible, and each entity should be allowed to receive at least its full allotment of six FG D codes, as per the current CIC Assignment Guidelines. Assignments should be made from the entire pool of four-digit codes with the exception of the 9000s block, which should initially be set aside for potential future administrative uses. (CICs within the range 9000 through 9199 are currently designated for "intranetwork" use and are unassignable.)

Life of the four-digit CIC resource (Paragraph 43)

34. The life of the four-digit CIC resource is dependent upon the rate of assignment, and the anticipated pent-up demand for CICs that has accumulated during current Commission imposed conservation limit of two codes per entity. The NANC has made an estimate of the life of four-digit CICs, based upon its assumptions that 1,680 codes might be requested when the current two codes per entity limit is lifted and access customers are permitted to be directly assigned up to six codes, that approximately 1,500

codes are presently assigned, and that the ongoing assignment rate will be 25 codes per month. This estimate predicts the life of four-digit CICs at 22 years.

The NANC recognizes that any estimate of the life of the four-digit CIC resource can only be considered as a best guess. Notwithstanding this uncertainty, the NANC believes that its assumptions are conservative and that the four-digit CIC resource will be available for a considerable time, that transition to a five digit code will therefore not be necessary any time in the near term, and that careful monitoring of the resource by the NANPA should provide the industry with the necessary information to plan for such a transition in the distant future, should it ever be required.

Reclamation of CICs (Paragraphs 46-51)

35. The NANC concurs with the Commission's belief that mandatory reclamation of CICs could extend the life of the resource and avoid the premature effort and expense associated with further expansion. The NANC believes that with minor modification, the current CIC Assignment Guidelines provide the NANPA with a reclamation process that has proven workable and successful.

36. The NANC recommends that two of the criteria associated with reclamation be considered for promulgation as Commission Rules. These are (1) the CIC must be activated within six months (modified from the existing four month requirement) of assignment (as indicated by return of the activation form), and (2) the CIC must show access and usage (as indicated on the semi-annual report which the NANPA provides to the Commission)¹. In the NANC's view, the increased availability of CICs and the need for flexibility in carrier usage and industry self-regulation weigh strongly against blanket codification by the Commission of the CIC Assignment Guidelines. However, the NANC remains concerned that if there are no formal mechanisms for assessing whether CICs have been requested and assigned in good faith, for real commercial needs, the CIC assignment process would be open to abuse. Thus, the NANC recommends that CICs that are not activated and used should be subject to reclamation under authority of a Commission Rule. The NANC notes that the NANPA will have far greater apparent authority to implement the CIC Assignment Guidelines if its reclamation criteria are undertaken under Commission rules.

37. Finally, the NANC supports the current 10 working day requirement in which the NANPA must respond to a request for a CIC assignment, and the existing six month period that a CIC, either reclaimed or returned, must age before being reassigned.

¹ If the absence of CIC usage on a LEC report triggers reclamation, the CIC assignee may provide the NANPA a copy of a valid LEC access bill showing CIC usage for the period in question.

Usage reporting requirements (Paragraph 53)

38. The Further Notice proposes that, because monitoring and reporting CIC usage will aid the industry's and the Commission's "joint efforts to conserve CICs," monitoring requirements should be codified and imposed on all LECs and CIC assignees. Further Notice ¶ 53. The NANC supports the FCC's conclusion that monitoring and reporting CIC access and usage will aid the effort to identify any future need to conserve CICs. The NANC recommends that codification of the aforementioned two criteria for reclamation is sufficient to support conservation needs and that codification of Section 7.2 of the CIC Assignment Guidelines is not necessary. The NANPA should continue to monitor CIC usage and use the semi-annual usage reports as a tool for projecting the exhaust of the CIC resource. However, consistent with current practice, LECs (and other access providers) should be responsible for reporting semi-annual CIC usage to NANPA. The NANC does not believe that any significant additional information would be gained by imposing a CIC usage reporting requirement directly on CIC assignees, so long as each entity certifies that it has activated and is using its assigned CICs, because any "warehoused" CICs will be evident from a lack of usage reported by LECs.

Conclusion

39. The recommendations in this Report are provided by the NANC in response to the FCC's directive, and represent an industry consensus achieved through cooperative discussion and problem solving of the members. The NANC offers these recommendations under the assumptions that CICs represent a finite resource and should, therefore, be used efficiently and conserved to the extent possible and that the prudent use of CICs is inherent in the provision of telecommunications services. The NANC believes that the industry's voluntary use and adherence with the CIC Assignment Guidelines will continue to be effective in the provision of telecommunications services and the management of a finite resource.

APPENDIX A

NANC CIC AD HOC WORKING GROUP PARTICIPANTS

Co-Chairs:

Peter Guggina	MCI
Paul Hart	USTA

Participants:

Phyllis Anderson	SBC
Richard Bartel	Comm. Venture
Margaret Bumgarner	U S WEST
Steve Engelman	MCI
Norman Epstein	GTE
Nancy Fears	NANPA
Richard Fruchterman	WorldCom
Ron Havens	Sprint
Bob Hirsch	A T & T
David Lockwood	Comm. Venture
Tim Mack	Ameritech
John Manning	ATIS
Glen Manishin	MCI
Bob Montgomery	Bell Atlantic
Norina Moy	Sprint
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Ahmed Patel	MCI
Julie Petersen	SBC
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Richard Round	GTE
Bill Shaughnessy	BellSouth

Observers:

Renee Alexander	FCC
Marian Gordon	FCC
Kris Montieth	FCC
Elizabeth Nightingale	FCC
Alan Hasselwander	Frontier

Note: CIC Ad Hoc meetings were held on December 17, 1997; January 19, 1998; and February 5, 1998.
Not all listed participants attended all scheduled meetings.

APPENDIX B

GTE Minority Opinion [Reference Paragraph 36, 37, & 38]

GTE has a minority opinion that states that although CIC's obtained through Mergers and Acquisitions should not be counted against the existing limit for codes (2) or whatever is recommended by the ad hoc once the existing limit is revised, there should be another overall limit for CIC's added to the guidelines. This additional limit should be a maximum limit on CIC's assigned to any one entity. The limit should be a quantity of CICs no greater than .05% of the industry resource. This would translate to 50 codes as an absolute maximum to any one entity. The rationale behind this absolute maximum is to prevent an undue quantity of these codes falling under the assignment of any one entity which would create a competitive imbalance in the industry. To prevent such an imbalance which would give one entity greater than .05% of the total resource such an overall limit should be established. Any entities with greater than this quantity of CIC's should be obligated to return the excess number of codes above the .05% limit within six months of establishing the limit.

BellSouth Minority Opinion [Reference Paragraph 36]

BellSouth does not agree with the NANC recommendation that CICs associated with mergers and acquisitions should not count toward the maximum number of CICs which can be directly assigned to any given entity. BellSouth feels that the CICs acquired through a merger or acquisition should be counted toward the maximum number of CICs per entity. BellSouth is not recommending that any CICs be returned but simply that they count towards the limit which can be directly assigned to any given entity.